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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

MARC WOLSTENHOLME,  
Plaintiff,  
v.  
RIOT GAMES, INC.,  
Defendant.

Case No. 2:25-cv-00053-FMO-BFM

*Hon. Fernando M. Olguin*

**DEFENDANT RIOT GAMES,  
INC.'S RESPONSE TO  
PLAINTIFF'S FIRST SET OF  
REQUESTS FOR PRODUCTION  
OF DOCUMENTS**

PROPOUNDING PARTY: PLAINTIFF MARC WOLSTENHOLME  
RESPONDING PARTY: DEFENDANT RIOT GAMES, INC.  
SET NUMBER: ONE

Pursuant to Federal Rule of Civil Procedure 34 and the corresponding Local Rules of the Central District of California, Defendant Riot Games, Inc. (“Riot” or “Defendant”) hereby responds to Plaintiff Marc Wolstenholme’s (“Wolstenholme” or “Plaintiff”) Requests for Production of Documents, Set Number One (the “Requests”), as follows:

**PRELIMINARY STATEMENT**

Each of the responses to the individual document requests herein incorporates and is subject to this preliminary statement and the general and specific objections set forth below. The preliminary statement and objections form a part of the response to each document request and are set forth in this manner to avoid repetition. While the preliminary statement and objections may be referred to specifically in response to an individual document request, the failure to do so is not and should not be construed as a waiver thereof.

Without in any way obligating itself to do so, Riot reserves the right to modify or supplement its responses and to produce, introduce or rely upon subsequently acquired or discovered information or documents at trial or in any pretrial proceedings held herein as additional facts are ascertained, as documents are obtained, as additional contentions are formulated, and as additional discovery, analysis, or research may reveal. Riot’s responses are not in any way to be deemed an admission or representation that there are no further facts, documents, or witnesses with knowledge or information relevant to the subject matter of these document requests.

Riot’s responses are made solely for the purposes of this action. No incidental or implied admissions are intended by these responses. Riot does not concede the relevance, materiality, propriety, or admissibility of any document request or the subject matter to which it relates. These responses are made by Riot subject to, and without in any way waiving or intending to waive:

- i. Any objections as to competency, materiality, privilege, relevancy, propriety, confidentiality/trade secrecy, admissibility and/or any other objections on grounds which would require exclusion of any information contained herein;
- ii. The right to object to other discovery proceedings involving or relating to the same subject matter as the document requests; or
- iii. The right at any time to revise, correct, add to, or clarify any of the responses set forth herein. Furthermore, these responses are given subject to correction of any omissions or errors.

Riot will make reasonable efforts to respond to every document request, to the extent it has not been objected to, as Riot understands and interprets the document request, provided that the document request is not so vague and ambiguous that a response is impossible. If Wolstenholme subsequently asserts an interpretation of the document request that differs from that of Riot, Riot reserves the right to supplement its objections and responses as necessary.

A protective order has not yet been entered in this action; Riot will produce responsive documents subject to the Court's entry of an appropriate protective order.

### **GENERAL OBJECTIONS**

1. Riot objects to these Requests, and to each of the individual requests, on the grounds that they are overbroad and unduly burdensome.

2. Riot further objects to these Requests, and to each of the individual requests, on the grounds that they are overbroad, not reasonably calculated to lead to the discovery of admissible evidence, and not proportional to the needs of the case.

3. Riot further objects to these Requests, and to each of the individual requests, on the grounds that they are vague and ambiguous.

1           4.     Riot further objects to these Requests, and to each of the individual  
2 requests, to the extent they seek information protected from disclosure by the  
3 attorney-client privilege, the work product doctrine, the joint defense/common  
4 interest privilege or any other applicable claim of privilege (“privileged  
5 information”). Riot does not intend to disclose any privileged information in  
6 response to these requests, and any undertaking by Riot to respond to these  
7 requests should be understood to exclude privileged information. Any disclosure  
8 of privileged information is inadvertent and shall not be deemed to constitute a  
9 waiver of any privilege or protection.

10           5.     Riot further objects to the Requests in their entirety to the extent they  
11 attempt or purport to impose obligations on Riot beyond those set forth in the  
12 Federal Rules of Civil Procedure. In the following responses, all definitions and  
13 other instructions shall be treated as having no force or effect to the extent that they  
14 exceed those duties.

15           6.     Riot objects to each Request to the extent it calls for proprietary,  
16 confidential, and/or trade secret information of Riot, any other defendant, and/or  
17 third parties, and/or information protected by the right of privacy.

18           7.     Riot objects to the Requests to the extent they seek information or  
19 documents that are equally available to Wolstenholme and/or within the  
20 possession, custody, or control of Wolstenholme.

21           8.     Riot objects to each Request to the extent it attempts or purports to  
22 impose an obligation to investigate or discover information from third parties not  
23 under its control and/or from persons who are equally accessible to Wolstenholme.

24           9.     Riot objects to the form for producing electronically stored  
25 information described in the requests. Riot will produce information in the form or  
26 forms in which it is ordinarily maintained or in a form that is reasonably usable.

27           Riot’s responses are made subject to all general and specific objections and  
28 it specifically reserves the right to reassert those objections by motion or at any

1 time at trial.  
2

3  
4 **RESPONSES TO REQUESTS FOR PRODUCTION**

5 **Category 1: Development Timeline & Access to Plaintiff's Work**

6 **Request (a):**

7 All documents and communications related to the development timeline of  
8 Arcane, including drafts, scripts, concept art, and storyboards.

9 **Response to Request (a):**

10 Riot incorporates by reference the Preliminary Statement and General  
11 Objections as though fully set forth here. Riot further objects to this Request on the  
12 ground that it calls for information that is not relevant to the claims and defenses in  
13 this action nor reasonably calculated to lead to the discovery of admissible  
14 evidence. Riot further objects to this Request because it is so overbroad as to be  
15 unduly burdensome and harassing. Subject to and without waiving the foregoing  
16 objections, Riot responds: Riot is willing to meet and confer with Wolstenholme  
17 regarding whether this Request can be reasonably narrowed. Riot's investigation is  
18 ongoing, and it reserves the right to supplement its response.

19 **Request (b):**

20 All documents showing access to Riot Forge submissions, including  
21 submissions dated April 15 and April 19, 2020, related to Bloodborg: The Harvest.

22 **Response to Request (b):**

23 Riot incorporates by reference the Preliminary Statement and General  
24 Objections as though fully set forth here. Riot further objects to this Request on the  
25 ground that it calls for information that is not relevant to the claims and defenses in  
26 this action nor reasonably calculated to lead to the discovery of admissible  
27 evidence. Riot further objects to this Request because it is so overbroad as to be  
28 unduly burdensome and harassing. Subject to and without waiving the foregoing

1 objections, Riot responds: After a reasonable search and diligent inquiry, Riot has  
2 not been able to locate any evidence of any submission relating to “Bloodborg: The  
3 Harvest.” Riot’s investigation is ongoing, and it reserves the right to supplement its  
4 response.

5  
6 **Request (c):**

7 Internal communications (emails, Slack messages, meeting notes) discussing  
8 Riot Forge submissions and potential adaptations of external ideas.

9 **Response to Request (c):**

10 Riot incorporates by reference the Preliminary Statement and General  
11 Objections as though fully set forth here. Riot further objects to this Request on the  
12 ground that it calls for information that is not relevant to the claims and defenses in  
13 this action nor reasonably calculated to lead to the discovery of admissible  
14 evidence. Riot further objects to this Request because it is so overbroad as to be  
15 unduly burdensome and harassing. Subject to and without waiving the foregoing  
16 objections, Riot responds: Riot is willing to meet and confer with Wolstenholme  
17 regarding whether this Request can be reasonably narrowed. Riot’s investigation is  
18 ongoing, and it reserves the right to supplement its response.

19  
20 **Request (d):**

21 All agreements between Riot Games and Curtis Brown Group, United Talent  
22 Agency (UTA), or Fortiche Productions regarding Arcane’s development

23 **Response to Request (d):**

24 Riot incorporates by reference the Preliminary Statement and General  
25 Objections as though fully set forth here. Riot further objects to this Request on the  
26 ground that it calls for information that is not relevant to the claims and defenses in  
27 this action nor reasonably calculated to lead to the discovery of admissible  
28 evidence. Riot further objects to this Request because it is so overbroad as to be

unduly burdensome and harassing. Subject to and without waiving the foregoing objections, Riot responds: Riot is willing to meet and confer with Wolstenholme regarding whether this Request can be reasonably narrowed. Riot's investigation is ongoing, and it reserves the right to supplement its response.

**Request (e):**

All documents referencing "Bloodborg" or "M.W. Wolf" or Marc Wolstenholme or any codenames related to these words within Riot Games' internal and external communications.

**Response to Request (e):**

Riot incorporates by reference the Preliminary Statement and General Objections as though fully set forth here. Riot further objects to this Request to the extent it calls for information protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable privilege. Subject to and without waiving the foregoing objections, Riot responds: Riot is willing to meet and confer with Wolstenholme regarding whether this Request can be reasonably narrowed. Riot's investigation is ongoing and it reserves the right to supplement its responses.

**Category 2: Copyright Infringement & Substantial Similarities**

**Request (a):**

All Riot Games communications discussing similarities between Bloodborg: The Harvest and Arcane.

**Response to Request (a):**

Riot incorporates by reference the Preliminary Statement and General Objections as though fully set forth here. Subject to and without waiving the foregoing objections, Riot responds: Riot is willing to meet and confer with Wolstenholme regarding whether this Request can be reasonably narrowed. Riot's investigation is ongoing and it reserves the right to supplement its responses.

**Request (b):**

Any internal analyses, reports, or comparisons of external works against Arcane's storyline.

**Response to Request (b):**

Riot incorporates by reference the Preliminary Statement and General Objections as though fully set forth here. Riot further objects to this Request on the ground that it calls for information that is not relevant to the claims and defenses in this action nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, Riot responds: Riot is willing to meet and confer with Wolstenholme regarding whether this Request can be reasonably narrowed. Riot's investigation is ongoing and it reserves the right to supplement its response.

**Request (c):**

Documents identifying all individuals involved in script revisions made at any time but more focused post-April 2020.

**Response to Request (c):**

Riot incorporates by reference the Preliminary Statement and General Objections as though fully set forth here. Riot further objects to this Request on the ground that it calls for information that is not relevant to the claims and defenses in this action nor reasonably calculated to lead to the discovery of admissible evidence. Riot further objects to this Request because it is so overbroad as to be unduly burdensome and harassing. Subject to and without waiving the foregoing objections, Riot responds: Riot is willing to meet and confer with Wolstenholme regarding whether this Request can be reasonably narrowed. Riot's investigation is ongoing and it reserves the right to supplement its response.



**Category 3: Casting, Contracts, and Financial Records**

**Response to Request (a):**

Contracts, NDAs, and agreements signed by Arcane's voice actors.

**Response to Request (a):**

Riot incorporates by reference the Preliminary Statement and General Objections as though fully set forth here. Riot further objects to this Request on the ground that it calls for information that is not relevant to the claims and defenses in this action nor reasonably calculated to lead to the discovery of admissible evidence. Riot further objects to this Request because it is so overbroad as to be unduly burdensome and harassing.

**Request (b):**

Documents reflecting Riot Games' financial transactions with Curtis Brown, UTA, and Fortiche Productions.

**Response to Request (b):**

Riot incorporates by reference the Preliminary Statement and General Objections as though fully set forth here. Riot further objects to this Request on the ground that it calls for information that is not relevant to the claims and defenses in this action nor reasonably calculated to lead to the discovery of admissible evidence. Riot further objects to this Request because it is so overbroad as to be unduly burdensome and harassing.

**Request (c):**

Records of casting decisions, including discussions of potential intellectual property conflicts.

**Response to Request (c):**

Riot incorporates by reference the Preliminary Statement and General Objections as though fully set forth here. Riot further objects to this request on the

1 ground that it is vague and ambiguous. Riot further objects to this Request on the  
2 ground that it calls for information that is not relevant to the claims and defenses in  
3 this action nor reasonably calculated to lead to the discovery of admissible  
4 evidence. Riot further objects to this Request because it is so overbroad as to be  
5 unduly burdensome and harassing. Riot further objects to this Request to the extent  
6 it calls for information protected from disclosure by the attorney-client privilege,  
7 the work product doctrine, or any other applicable privilege.

8  
9 **Request (d):**

10 All documents regarding deals, bargaining and quid pro quo deals.

11 **Response to Request (d):**

12 Riot incorporates by reference the Preliminary Statement and General  
13 Objections as though fully set forth here. Riot further objects to this request on the  
14 ground that it is vague and ambiguous. Riot further objects to this Request on the  
15 ground that it calls for information that is not relevant to the claims and defenses in  
16 this action nor reasonably calculated to lead to the discovery of admissible  
17 evidence. Riot further objects to this Request because it is so overbroad as to be  
18 unduly burdensome and harassing. Riot further objects to this Request to the extent  
19 it calls for information protected from disclosure by the attorney-client privilege,  
20 the work product doctrine, or any other applicable privilege.

21  
22 **Category 4: Corporate Conduct & Bad Faith Actions**

23 **Request (a):**

24 Internal Riot Games communications discussing Plaintiff's copyright claim.

25 **Response to Request (a):**

26 Riot incorporates by reference the Preliminary Statement and General  
27 Objections as though fully set forth here. Riot further objects to this Request to the  
28 extent it calls for information protected from disclosure by the attorney-client

1 privilege, the work product doctrine, or any other applicable privilege. Subject to  
2 and without waiving the foregoing objections, Riot responds: Riot is willing to  
3 meet and confer with Wolstenholme regarding whether this Request can be  
4 reasonably narrowed. Riot's investigation is ongoing and it reserves the right to  
5 supplement its response.

6  
7 **Request (b):**

8 All documents related to Riot Games' responses to Plaintiff's cease-and-  
9 desist demands.

10 **Response to Request (b):**

11 Riot incorporates by reference the Preliminary Statement and General  
12 Objections as though fully set forth here. Riot further objects to this Request to the  
13 extent it calls for information protected from disclosure by the attorney-client  
14 privilege, the work product doctrine, or any other applicable privilege. Subject to  
15 and without waiving the foregoing objections, Riot responds: Riot is unaware of  
16 any non-privileged documents that are responsive to this request. Riot's  
17 investigation is ongoing and it reserves the right to supplement its responses as  
18 necessary.

19  
20 **Request (c):**

21 All records showing Riot Games' compliance with litigation hold notices  
22 and evidence preservation.

23 **Response to Request (c):**

24 Riot incorporates by reference the Preliminary Statement and General  
25 Objections as though fully set forth here. Riot further objects to this Request to the  
26 extent it calls for information protected from disclosure by the attorney-client  
27 privilege, the work product doctrine, or any other applicable privilege. Riot further

1 objects to this Request because it is so overbroad as to be unduly burdensome and  
2 harassing.

3  
4 DATED: April 14, 2025

MITCHELL SILBERBERG & KNUPP LLP

5  
6 By:



7 AARON J. MOSS (SBN 190625)  
8 JOSHUA M. GELLER (SBN 295412)  
9 HANNAH G. SHEPHERD (SBN 347611)  
10 Attorneys for Defendant Riot Games, Inc.

**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California, I am over the age of eighteen years and am not a party to this action; my business address is Mitchell Silberberg & Knupp LLP, 2049 Century Park East, 18th Floor, Los Angeles, CA 90067-3120, and my business email address is mxb@msk.com.

On April 14, 2025, I served a copy of the foregoing document(s) described as **DEFENDANT RIOT GAMES, INC.'S RESPONSE TO PLAINTIFF'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS** on the interested parties in this action at their last known address as set forth below by taking the action described below:

Marc Wolstenholme *Plaintiff in Pro Per*  
5 Shetland Close  
Coventry, England CV5 7LS  
Tel: 044 7827964404  
Email: marc@mvwolf-fiction.co.uk

- ☒ **BY MAIL:** I placed the above-mentioned document(s) in sealed envelope(s) addressed as set forth above, and deposited each envelope in the mail at Los Angeles, California. Each envelope was mailed with postage thereon fully prepaid.
- ☒ **BY ELECTRONIC MAIL:** I served the above-mentioned document electronically on the parties listed at the email addresses above and, to the best of my knowledge, the transmission was complete and without error in that I did not receive an electronic notification to the contrary.

I declare under penalty of perjury under the laws of the United States that the above is true and correct.

Executed on April 14, 2025, at Los Angeles, California.

  
\_\_\_\_\_  
Monica Bowdre